

Exhibit 17

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

---oOo---

WAYMO LLC,

Plaintiff,

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING,

INC.,

Defendants.

-----/

ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF ANTHONY LEVANDOWSKI

SAN FRANCISCO, CALIFORNIA

FRIDAY, APRIL 14, 2017

BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~

CSR LICENSE NO. 9830

JOB NO. 2594023

Pages 1 - 184

Page 1

1 A On the advice and direction of my counsel, I 10:44
2 respectfully decline to answer. And I assert the 10:44
3 rights guaranteed to me under the Fifth Amendment of 10:44
4 the Constitution of the United States. 10:44

5 Q The 14,000 files that you exported to an 10:44
6 external device on December 14th, 2015, were exported 10:45
7 so that you could use them to compete with Google by 10:45
8 using Google's confidential information; correct? 10:45

9 A On the advice and direction of my counsel, I 10:45
10 respectfully decline to answer. And I assert the 10:45
11 rights guaranteed to me under the Fifth Amendment of 10:45
12 the Constitution of the United States. 10:45

13 Q The five files you exported on January 3rd, 10:45
14 2016, were exported so that you could compete with 10:46
15 Google by using Google's confidential information? 10:46

16 A On the advice and direction of my counsel, I 10:46
17 respectfully decline to answer. And I assert the 10:46
18 rights guaranteed to me under the Fifth Amendment of 10:46
19 the Constitution of the United States. 10:46

20 Q On January 11th, 2016, you exported a file 10:46
21 called "Chauffeur TL Weekly Updates Q4 2015" from 10:46
22 Google's internal drive database? 10:46

23 A On the direction of my counsel, I 10:46
24 respectfully decline to answer. And I assert the 10:46
25 rights guaranteed to me under the Fifth Amendment of 10:46

1 the Constitution of the United States. 10:46

2 Q On January 11, 2016, you exported a file from 10:46
3 Google's internal drive database so that you could use 10:46
4 it to support the new company you were founding -- 10:46
5 founding; correct? 10:46

6 A On the advice and direction of my counsel, I 10:46
7 respectfully decline to answer. And I assert the 10:46
8 rights guaranteed to me under the Fifth Amendment of 10:46
9 the Constitution of the United States. 10:47

10 Q On January 11, 2016, you exported a file from 10:47
11 Google's internal drive database so that you could use 10:47
12 it at your new company to compete with Google? 10:47

13 A On the advice of and -- and direction of my 10:47
14 counsel, I respectfully decline to answer. And I 10:47
15 assert the rights guaranteed to me under the Fifth 10:47
16 Amendment of the Constitution of the United States. 10:47

17 Q You directed Google employees that you asked 10:47
18 to join you at your new company to export documents 10:47
19 from Google computers, before departing Google, to 10:47
20 bring with you to Waymo -- to Otto? 10:47

21 A On the advice and direction of my counsel, I 10:48
22 respectfully decline to answer. And I assert the 10:48
23 rights guaranteed to me under the Fifth Amendment of 10:48
24 the Constitution of the United States. 10:48

25 Q Let me just ask that again, because I asked 10:48